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October 22, 2013

BY HAND AND E-FILED

Hon. Cynthia Kern, J.S.C.
New York State Supreme Court
60 Centre Street, Room 432, Part 55
New York, New York 10007
Attn: Yael Wilkofsky, Senior Law Clerk

RE: **People v. The Trump Entrepreneur Initiative LLC, Sup. Ct., NY Co. (Index No: 451463/13)**

Dear Ms. Wilkofsky:

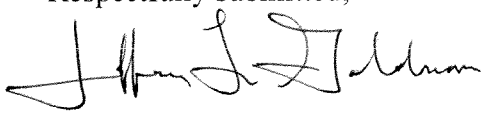
We represent The Trump Entrepreneur LLC f/k/a Trump University LLC, DJT Entrepreneur Member LLC f/k/a DJT University Member LLC, DJT Entrepreneur Managing Member LLC f/k/a DJT University Managing Member LLC, The Trump Organization, Inc., Trump Organization LLC, and Donald J. Trump, respondents in the above-referenced special proceeding (the "Trump Respondents").

Rule 14(b) of the Supreme Court, New York County Rules of the Justices states that "[u]nless advance permission otherwise is granted by the court for good cause, memoranda of law shall not exceed 30 pages each (exclusive of table of contents and table of authorities) and affidavits/affirmations shall not exceed 25 pages each." Notwithstanding this rule, Petitioner has submitted a 73-page affirmation and a 33-page memorandum of law (together with almost a banker's box filled with exhibits) in support of the above-captioned Petition.

Although we do not believe that Petitioner received any advanced permission, the Trump Respondents are requesting the Court's advanced permission to exceed the page limits established by Rule 14(b) as we anticipate filing a response to the Petition on or before November 1, 2013. We believe good cause to exceed the Court's page limits exists given the immense size of Petitioner's submission, to which we now must respond.

I thank you for your time in this matter.

Respectfully submitted,



Jeffrey L. Goldman

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